

SUBJECT: OCCUPATIONAL HEALTH AND SAFETY ADMINISTRATION "TEN MOST WANTED LIST" FOR FIRE DEPARTMENTS

DATE: OCTOBER 3, 2007

The following Occupational Health and Safety Administration (OSHA) General Industry Title 29 Code of Federal Regulations (CFR) 1910 standards are the most frequently cited during fire department inspection or investigation by OSHA compliance officers.

1. 29 CFR 1910:134 Respiratory Protection:
 - a. This standard requires a specific written plan that works with the overall Personal Protective Equipment written plan 29 CFR 1910:132 also known as a "Certified Hazard Assessment".
 - b. Requires annual training and the employer must certify personnel as "qualified."
 - c. Failure to have and maintain these plans have caused numerous departments to be cited for failure to meet the program requirements.
2. 29 CFR 1910:1200 Hazard Communication:
 - a. This standard is the Number #1 cited standard throughout general industry by both Federal and State OSHA.
 - b. This standard requires a specific written plan.
 - c. Requires annual training by the employer.
3. 29 CFR 1910:120 Hazardous Waste Operations and Emergency Response (HAZWOPER):
 - a. This standard requires a very in-depth written plan.
 - b. Establishes training requirements for "emergency response."
 - c. Requires that the employer establish duty positions and to train personnel to meet these duty positions.
 - d. Requires training in Incident Command System (ICS).
4. 29 CFR 1910:1030 Bloodborne Pathogens:
 - a. This standard requires a written plan.
 - b. Requires annual training.
5. 29 CFR 1910:156 Fire Brigades:
 - a. This standard requires a statement or written policy regarding the fire brigade.
 - b. Requires annual training.
6. 29 CFR 1910:38 Emergency Action Plans:
 - a. This standard requires a written plan.
 - b. Requires annual training.
7. 29 CFR 1910:39 Fire Prevention Plans:
 - a. This standard requires a written plan.
 - b. Requires annual training.
8. 29 CFR 1910: Subpart D – Walking-working surfaces:
 - a. This section covers various types of ladders and working surfaces.
 - b. Addresses fall protection, such as working on roofs, etc.

9. 29 CFR 1910:146 Permit-Required Confined Spaces:

- a. This standard requires a very specific written plan.
- b. Requires annual training.

10. 29 CFR 1910:106 Flammable and Combustible Liquid Storage:

- a. This standard covers both in station operations and emergency scene operations, where the use of flammable and combustible liquids is used.

There are numerous other standards that apply to fire department operations. Those listed above are the most commonly cited by OSHA compliance officers. The entire 29 CFR 1910 General Industry standards manual should be reviewed by fire department personnel to ensure compliance with OSHA regulations.

During emergency operations many of these regulations have to be enacted. This is best accomplished by implementing department specific "Standard Operating Procedures" before the emergency response.

Any questions regarding fire department occupational safety and health...please contact me @ 317.439.9122.

Lawrence J. Hamby, HazMat Specialist
Indiana Department of Homeland Security
Hazardous Materials/WMD/Counter-Terrorism Division